

Exhibit 9

WSP Workload on County Roads For All Activity Types, Including Hours, FTEs and Cost
Current Level Compared To Two Potential Target Levels
By County / Groups of Counties, In Order of Total Reductions Achieved Through Meeting the "Median" Target Level

County(ies)	Current Level			Target: Based on Median			Target: Based on 25th Percentile		
	Hours	FTEs	Cost	New Target Levels		Savings If Target Achieved	New Target Levels		Savings If Target Achieved
				Hours	FTEs		Hours	FTEs	
Spokane	15,305	8.4	\$ 615,973	9,094	5.0	\$ 366,005	6,211	3.4	\$ 249,968
Pierce	17,616	9.7	\$ 708,966	11,994	6.6	\$ 482,726	5,621	3.1	\$ 226,240
Yakima	5,803	3.2	\$ 233,533	2,726	1.5	\$ 109,702	3,077	1.7	\$ 123,832
Lewis	4,021	2.2	\$ 161,813	1,607	0.9	\$ 64,659	2,414	1.3	\$ 97,154
Snohomish	9,713	5.3	\$ 390,902	7,607	4.2	\$ 306,139	2,106	1.2	\$ 84,764
Kitsap	5,100	2.8	\$ 205,271	3,623	2.0	\$ 145,803	1,478	0.8	\$ 59,469
Thurston	6,283	3.5	\$ 252,871	4,842	2.7	\$ 194,861	1,441	0.8	\$ 58,009
Whatcom	3,551	2.0	\$ 142,912	2,602	1.4	\$ 104,730	949	0.5	\$ 38,182
Mason	1,991	1.1	\$ 80,128	1,139	0.6	\$ 45,822	852	0.5	\$ 34,305
Skagit	2,524	1.4	\$ 101,586	1,872	1.0	\$ 75,357	652	0.4	\$ 26,229
Pacific	812	0.4	\$ 32,694	226	0.1	\$ 9,096	586	0.3	\$ 23,598
Kittitas	837	0.5	\$ 33,674	434	0.2	\$ 17,472	403	0.2	\$ 16,202
Cllallam, Jefferson	1,122	0.6	\$ 45,160	780	0.4	\$ 31,382	342	0.2	\$ 13,778
Island	1,802	1.0	\$ 72,522	1,525	0.8	\$ 61,379	277	0.2	\$ 11,143
Benton, Franklin	1,542	0.8	\$ 62,061	1,317	0.7	\$ 52,999	225	0.1	\$ 9,063
Cowlitz, Wahkiakum	630	0.3	\$ 25,363	436	0.2	\$ 17,630	192	0.1	\$ 7,734
Adams, Lincoln	524	0.3	\$ 21,089	524	0.3	\$ 21,089	0	0.0	\$ -
Asotin, Colmb, Grfld, W	1,009	0.6	\$ 40,589	1,009	0.6	\$ 40,589	0	0.0	\$ -
Chelan	427	0.2	\$ 17,193	427	0.2	\$ 17,193	0	0.0	\$ -
Clark	1,565	0.9	\$ 62,982	1,565	0.9	\$ 62,982	0	0.0	\$ -
Ferry, Pend Or, Stvns	1,231	0.7	\$ 49,556	1,231	0.7	\$ 49,556	0	0.0	\$ -
Grant, Douglas	1,240	0.7	\$ 49,901	1,240	0.7	\$ 49,901	0	0.0	\$ -
Grays Harbor	469	0.3	\$ 18,869	469	0.3	\$ 18,869	0	0.0	\$ -
King	5,951	3.3	\$ 239,507	5,951	3.3	\$ 239,507	0	0.0	\$ -
Klickitat, Skamania	278	0.2	\$ 11,194	278	0.2	\$ 11,194	0	0.0	\$ -
Okanogan	788	0.4	\$ 31,722	788	0.4	\$ 31,722	0	0.0	\$ -
Whitman	264	0.1	\$ 10,634	264	0.1	\$ 10,634	0	0.0	\$ -
Total	92,399	50.9	\$ 3,718,666	65,572	36.1	\$ 2,638,997	26,827	14.8	\$ 1,079,669
							51,388	28.3	\$ 2,068,139
							41,011	22.6	\$ 1,650,527

AGENCY RESPONSES AND AUDITOR'S COMMENTS

Appendix 2

- **WASHINGTON STATE PATROL**
- **OFFICE OF FINANCIAL MANAGEMENT**
- **AUDITOR'S COMMENTS**



STATE OF WASHINGTON

WASHINGTON STATE PATROL

10000 1st Avenue, P.O. Box 40910 • Olympia, Washington 98504-2600 • (360) 734-1211

February 2, 1999

Dr. Thomas M. Sykes
Joint Legislative Audit and Review Committee
P O Box 40910
Olympia WA 98504-0910

RECEIVED

FEB - 2 1999

JLARC

Dear Dr. Sykes:

This is in response to your letter dated February 2, 1999, that reflects revisions to Recommendations 14 and 15 outlined in your preliminary report on the Washington State Patrol Performance Audit. You indicated these recommendations were revised and combined to include:

The Washington State Patrol and the Office of Financial Management should jointly review the basis for the Patrol's indirect cost recovery plan used in the administration of the Patrol's "DOT Master Contract," to determine if there is any need for modification.

We appreciate your willingness to consider comments from my staff and modify the recommendations related to indirect rates. I concur with your revised recommendation. However, as stated in my correspondence to you on January 26, 1999, with respect to the county road chapter, we are reserving comment until such time as we can review the final draft.

I hope to receive the county road chapter revision in the very near future in order to prepare for the performance audit presentation before the Joint Legislative Audit and Review Committee on February 16, 1999.

Sincerely,

CHIEF ANNETTE M. SANDBERG

AMS:sb

cc: Senator Don Benton, Senate Transportation Committee
Senator Mary Margaret Haugen, Senate Transportation Committee
Representative Ruth Fisher, House Transportation Committee
Representative Karen Schmidt, House Transportation Committee
Mr. Dick Thompson, Director, Office of Financial Management
Captain Eric E. Robertson, Government and Media Relations



STATE OF WASHINGTON

WASHINGTON STATE PATROL

General Administration Building, PO Box 42600 • Olympia, Washington 98504-2600 • (360) 753-6540

January 26, 1999

RECEIVED

Dr. Thomas M. Sykes
Joint Legislative Audit Review Committee
PO Box 40910
Olympia WA 98504-0910

JAN 26 1999 4:55 p.m.

JLARC

Dear Dr. Sykes:

Enclosed is the agency's formal response to the preliminary report of the Washington State Patrol Performance Audit that was presented to the Joint Legislative Audit and Review Committee (JLARC) on January 8, 1999. Also enclosed is a copy of the report with suggested technical and grammatical edits.

I appreciate the effort you and your staff have made since our December 1998 review of the report to respond to our comments. We continue to disagree with your analysis and recommendations related to indirect rates. We have not received a final draft of the county road chapter and reserve comment until such time. However, I am satisfied with your willingness to have a continued dialogue on these matters.

I am looking forward to presenting the Washington State Patrol's position at the upcoming presentation to the full JLARC committee.

Sincerely,


CHIEF ANNETTE M. SANDBERG

AMS:cf

Enclosures

cc: Senator Don Benton, Senate Transportation Committee
Senator Mary Margaret Haugen, Senate Transportation Committee
Representative Ruth Fisher, House Transportation Committee
Representative Karen Schmidt, House Transportation Committee
Mr. Dick Thompson, Director, Office of Financial Management
Captain Eric E. Robertson, Government and Media Relations



JLARC Response

Recommendation 1	Agency Position: Partially Concur	Comments: See Below
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The agency considers PAM a critical component of its trooper deployment process and its current pilot study to implement performance based budgeting. While the agency recognizes the need to modify and validate PAM, there remain some concerns with the report's recommendation. Of principal concern is whether or not the proposed modifications and validation of PAM will result in any significant improvement in the accuracy of the agency's trooper deployment decisions. Before any formal validation efforts are made, the agency will conduct a preliminary assessment of the report's recommendations to determine whether or not they can be effectively carried out. Should the assessment be favorable, it is anticipated that additional resources would be needed to fully implement the validation project.

Recommendation 2	Agency Position: Concur	Comments: See Below
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The agency is currently working on a pilot project with OFM and LTC staff to develop and implement performance measures as an integral part of its biennial budgeting process. This project involves extensive efforts to refine and utilize data elements from the agency's Computer Aided Dispatch (CAD) system. These data elements will be used to establish performance measures for trooper availability and response times based on call priority and by autonomous patrol areas. This pilot project will also assist the agency in establishing links between its strategic plan, investment decisions and performance outcomes.

Recommendation 3	Agency Position: Concur	Comments: See Below
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The agency is in compliance with all statutes and regulations pertaining to its regular call-out overtime compensation practices and believes its rotation practices are proper. The agency has reviewed its internal procedures to ensure sufficient controls are in place and all policies for call-outs are documented and consistently applied throughout the agency's eight field districts.

Recommendation 4	Agency Position: Concur	Comments: See Below
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The agency is in compliance with all statutes and regulations pertaining to its contract overtime compensation practices and believes its practices to be proper. The agency's principal source of contract overtime is the Department of Transportation (DOT). This contract was established in 1991 at the request of DOT to improve worker safety at highway construction projects. The agency believes its overtime practices with regards to this contract are proper. The agency has reviewed all district policies regarding the assignment of contract overtime to ensure sufficient controls are in place and all policies

JLARC Response

are documented and consistently applied throughout the agency's eight (8) field districts.

Recommendation 5	Agency Position: Concur	Comments: See Below
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The State Patrol's CVEO transition plan meets these recommendations and will provide the stability, professionalism and commitment to the program that is needed to ensure the mission of the division is accomplished.

Recommendation 6	Agency Position: Concur	Comments: None
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Recommendation 7	Agency Position: Concur	Comments: See Below
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Any proposed MCN related application or project will support the agency's six year strategic plan. These proposed applications or projects could be developed as legislatively-sponsored studies with budgets of approximately \$200,000.

Recommendation 8	Agency Position: Concur	Comments: None
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Recommendation 9	Agency Position: Concur	Comments: None
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Recommendation 10	Agency Position: Concur	Comments: None
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Recommendation 11	Agency Position: Partially Concur	Comments: See Below
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The recommendation to segregate vehicle purchase funds oversimplifies the challenge of balancing an agency budget that has high fixed costs (i.e. salaries, benefits, rent) when unanticipated emergent expenditures occur. When these emergent expenditures take place, they often must be funded with non-fixed funds – usually equipment. A way to segregate vehicle purchase funds into a dedicated account would be for the legislature to set up some kind of emergency account or revolving fund that the State Patrol could access in cases of emergency.

Recommendation 12	Agency Position: Concur	Comments: None
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JLARC Response

Recommendation 13	Agency Position: Concur	Comments: None
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Recommendation 14	Agency Position: Do Not Concur	Comments: See Below
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JLARC was provided with the agency's base allotments that include estimated indirect cost reimbursements from grants, interagency reimbursement and user fee collections assumed in the agency's budget.

In addition, JLARC staff were provided with copies of the accounting records that document the credits for recoveries. Indirect cost recoveries represent a credit to appropriations, not to specific expenditures, so the state's accounting system does not identify specific purchases bought with the reimbursement. In addition to being common business practice, these procedures are based on OFM regulations and chart of accounts, consistent with GAAP, and common to all agencies.

JLARC's preliminary report contains the troubling statement that the State Patrol could not provide a specific accounting of what past indirect cost recoveries were used for. The Patrol strongly objects to the implication that the Patrol is not using correct budgeting and accounting procedures.

Recommendation 15	Agency Position: Do Not Concur	Comments: See Below
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The basic premise of the federal OMB Circular A-87 is that indirect costs increase proportionately to direct costs. This has been a cornerstone of indirect cost reimbursement since the early 1970s. This principle is also incorporated in the state's OFM accounting standards. Overtime costs are not viewed differently than straight time costs under the provisions of the Washington State Patrol indirect cost plan and A-87 standards, and the approved plan has both straight time and overtime built into its calculations.

The Washington State Patrol developed its first indirect cost plan in the mid-1980s when it began to receive significant grant funding. The original plan was prepared by a consultant using federal OMB Circular A-87 cost accounting standards. The plan is updated annually and submitted to the State Patrol's federal cognizant agency – National Highway Traffic Safety Administration (NHTSA). The plan has been approved each year ("acceptable as written") by NHTSA and is reviewed by the Washington State Auditor under the single audit plan. **There has never been an audit finding or exception reported on the plan.**

JLARC Response

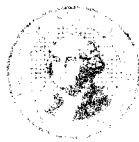
Comments on Chapter 3 – Although no recommendation was provided in the county road chapter, the agency has the following comments:

The State Patrol is currently working to implement the LTC's directive dated January 30, 1998 to limit county road activity to 10% of the Patrol's traffic law enforcement time. The agency has made substantial progress over the last five years in reducing the amount of time spent on county roads from approximately 20% to approximately 8% this current fiscal year. In an effort to continue this trend, the agency has been conducting negotiations with county law enforcement agencies to transfer county road responsibilities as required by the directive. The agency has made substantial progress by negotiating agreements with all but six counties. Negotiations with Mason, Pierce, Spokane, Snohomish, Thurston, and Lewis counties continue.

The agency however, has concerns about the "Target Service Level" trooper reductions proposed in this chapter. To begin with, the projected reductions are based on an arbitrary association between the number of vehicle miles traveled on county roads and the number of contacts. The report also fails to substantiate the relevance of this association with substantive evidence. It fails to consider a number of other important variables affecting county road activity including road conditions, weather, population, unemployment rates, geography, seasonal traffic patterns, economic and political factors.

The JLARC report does not explain why target service level reductions are needed, when the agency has already made substantial progress in complying with the LTC directive as noted previously. The agency is also concerned about the implication that in order to accomplish these target reductions, troopers would have to simply ignore all non-injury and property damage incidents observed on county roads.

The agency believes the establishment of prospective target service levels and trooper reductions beyond the LTC's directive is a policy matter that should be discussed within the context of the state's overall law enforcement strategy rather than be incorporated in the agency's performance audit.



RECEIVED

FEB - 3 1999

STATE OF WASHINGTON
OFFICE OF FINANCIAL MANAGEMENT

JLARC

1000 4th St. • Olympia, Washington 98504-3113 • 360 902 0737

February 2, 1999

Thomas Sykes, Legislative Auditor
Joint Legislative Audit and Review Committee
506 16th Avenue SE
Post Office Box 40910
Olympia, Washington 98504-0910

Dear Mr. Sykes: *Tom*

I am writing in response to your request for the Office of Financial Management's formal response to the preliminary report of the Washington State Patrol performance audit that was presented to the Joint Legislative Audit and Review Committee (JLARC) on January 8, 1999. The attached table summarizes our responses to the preliminary report.

I appreciate the opportunity to respond to the preliminary report. Please do not hesitate to contact me if you have any questions.

Sincerely,

Dick Thompson
Director

DT:DM:dh
Attachment



OFM response to the JLARC Preliminary Report of the Washington State Patrol

RECOMMENDATION	AGENCY POSITION	COMMENTS
Recommendation 1	CONCUR	
Recommendation 2	CONCUR	
Recommendation 3	CONCUR	
Recommendation 4	CONCUR	
Recommendation 5	PARTIALLY CONCUR	Successful implementation of a plan that expands the powers and duties of employees within the Commercial Vehicle Division require that all stakeholders reach consensus on the transition period, training requirements, and enforcement authority.
Recommendation 6	CONCUR	
Recommendation 7	CONCUR	
Recommendation 8	CONCUR	
Recommendation 9	CONCUR	
Recommendation 10	CONCUR	
Recommendation 11	PARTIALLY CONCUR	The Washington State Patrol should budget funds for vehicle purchase and operation in dedicated accounts only if an acceptable budget strategy is in place that addresses significant emergencies.
Recommendation 12	CONCUR	
Recommendation 13	CONCUR	
Recommendation 14	CONCUR	

February 2, 1999

Appendix 3

WASHINGTON STATE PATROL ACTIONS RESULTING FROM 1991 LTC RECOMMENDATIONS December 1998

LTC Recommendations and Actions Taken:

"Phase-out past models"

Past allocation models are no longer used by the Patrol. The Police Allocation Model (PAM) is now the only model used as a tool for determining trooper deployment and allocation needs.

"Use the Police Allocation Manual with reliable historical data"

During 1991, the Patrol used estimates of time and activity data for PAM calculations. At that time, actual workload data was not collected from TAS.

Beginning in 1991, the WSP formed the Time & Activity (TAS) Evaluation Committee to begin extensive efforts to overhaul and improve TAS. The business purpose of each time activity code was validated and the number of codes was reduced from 764 to only 92. The evaluation committee also conducted extensive efforts to enhance system reports.

"Modify TARS activity codes and collect data for one year"

As a result of the TAS overhaul, TARS activity codes were collected in the format required for PAM. Each year this information is analyzed to ensure that the data is reliable and stable. PAM reports are reviewed for discrepancies and unusual situations. Exceptions are further researched and corrections made accordingly.

"Define time activity categories"

In 1991, the four time activity categories used by PAM were specifically defined and the TAS user manual was completely rewritten. Since that time, the TAS user manual has been updated as changes occur. In addition, an extensive training effort was initiated in 1994 to educate the field staff on these changes. Also, each cadet class is given training on the appropriate use of the PAM activity codes and how to record their activity.

"Validate PAM to achieve credibility and analyze discrepancies. Benchmark it against current and past staffing levels using reliable historical data."

WASHINGTON STATE PATROL ACTIONS RESULTING FROM 1991 LTC RECOMMENDATIONS December 1998

Since 1994, PAM calculations have been reviewed to ensure the data is dependable and results are reasonable. Each year, model calculations are benchmarked against current and past trooper deployment levels to determine their reasonableness. This data is also compared to expected results submitted by management outlining trooper requests for each APA. District commanders independently create a list of their deployment needs documenting justification based on their professional judgement. Prior to deployment of troopers, this list is compared to the results of PAM, analyzed for reasonableness and adjustments made accordingly. In addition, annual workloads and staffing requests are analyzed and compared to previous periods to identify unusual situations. Any exceptions noted are researched and corrections made when necessary.

"Analyze activities to improve efficiency"

Work activities of the various APA's are annually analyzed for staff efficiency and effectiveness. Managers are notified when conditions are found which appear to be incorrect or are out of the norm. These conditions are further researched and appropriate action is taken to make improvements. For example, when we find one APA with a large amount of time required for Administrative activities compared to other APAs, we research which troopers exceeded the norm and notify the district commander of our findings. Based on the further research, the district commander takes appropriate action to improve performance.

"Modify electronic spreadsheet"

Since 1991, the PAM electronic spreadsheet has been greatly improved to make it easier to use and therefore a more precise tool. A comprehensive effort was made to redesign the worksheet layout and separate the data input area from the formulas. Formulas were corrected and alternatives became automated. Cells became protected except where the user is asked to provide data input, which was also highlighted in a separate color. Descriptive titles were added to both the worksheets and reports. In addition, ranges were named to help the user locate areas within the worksheet. The PAM spreadsheet has since been converted to Quattro and is now available in the Excel format.

WASHINGTON STATE PATROL ACTIONS RESULTING FROM 1991 LTC RECOMMENDATIONS December 1998

"Require an Implementation plan and Independently review Implementation"

The TAS Evaluation Committee was form in 1991 to make the improvements to PAM recommended in the LTC analysis. The Patrol has implemented most of the recommendations and has continued making improvements. A review of these improvements was conducted internally with consultation from Dr. William Stenzel who developed the model. In 1994, a survey of 17 states determined that the Patrol's use of PAM was consistent with the majority of PAM users.

"Review policy assumptions"

The Patrol periodically tests the policy assumptions used in the model for possible changes in policy decisions. Improvements are continually made to the assumptions used in the model, which further refines the result.

"Use PAM as Decision Tool"

PAM is recognized as a decision-making tool used by management to assist in making deployment decisions. It does not replace professional judgement, historical experience and other means used in making deployment decisions. As stated previously, district commanders independently create a list of their deployment requests, which is later compared to the results of PAM. Deployment decisions are made using all these factors as well as other information.

Appendix 9



Washington State Patrol: Washington Access To Criminal History

About
WATCH

New Account

WSP

Change
Report Type

New Search

Start Page

The following records match the search descriptors provided.

Name	DOB:	
HUDDLESTON, MICHAEL	8/12/55	--- No conviction criminal history found.

**Click on an individual's name to retrieve their criminal
history record,
or an abstract indicating that no criminal history was
found.**

**You may also click on the button below to view all
criminal history search results.**

[view all reports](#)

[FAQ](#) | [WSP Home Page](#) | [Home Page Washington](#)
Page last updated 12/6/98 3:49:52 PM



Please send technical comments, questions and inquiries regarding this site to:
WATCH.HELP@wsp.wa.gov.

Please send questions and inquiries regarding criminal history to: [Criminal History
Information@wsp.wa.gov](mailto:CriminalHistoryInformation@wsp.wa.gov).

To ensure a response, please include your name, daytime telephone number, e-mail
address, and postal address.

Use of the NAME or LOGO of the Washington State Patrol is restricted by law and may be used only with written
permission of the WSP.

<https://watch.wsp.wa.gov/watch/hitlist.asp>



Washington State Patrol: Washington Access To Criminal History

Washington State allows anyone to obtain Washington State criminal history conviction information. With this search engine, you may request, view, and print criminal history conviction records. However, to inquire about a person and to obtain his or her record, you must enter the correct date of birth and exact spelling of the person's name. Otherwise, the criminal history record you want will not be found.

Terms and Limitations of Criminal History Searches and Reports

1. A non-refundable fee of \$10.00 will be charged for every search, regardless of search results. If more than one record matches your description, you will be provided further instructions.
2. Positive identification can be based only upon a fingerprint comparison. For a general criminal history search, a fingerprint card is used. For child/adult abuse record search a thumbprint on the appropriate form (3000-240-430 3/93) is used. Contact a customer service representative at (360) 705-5100 if either one of these is necessary.
3. To retrieve a criminal history record, you must enter the exact spelling of the person's name and correct date of birth. Use of maiden names or alias names may require additional criminal history requests. **Misspellings may result in a failed search.**

☐ I accept these terms



The WSP criminal history search site uses
Cookies,
and requires a secure browser for SSL.



[FAQ](#) | [WSP Home Page](#) | [Home Page Washington](#)
Page last updated 11/22/1998 1:14:00 PM

Please send technical comments, questions and inquiries regarding this site to:

WATCHHELP@wsp.wa.gov

Please send questions and inquiries regarding criminal history to: [Criminal History](#)

Information@wsp.wa.gov



To ensure a response, please include your name, daytime telephone number, e-mail address, and postal address.

Use of the NAME or LOGO of the Washington State Patrol is restricted by law and may be used only with written permission of the WSP.

<http://watch.wsp.wa.gov/watchopen/default.asp>



WATCH

Washington State Patrol: Washington Access To Criminal History

About
WATCH

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WSP

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Report Type

New Search

Purchase Confirmed

Your order has been processed successfully.

For future reference, please make a note of the tracking number for this order.

Tracking Number: G8XG9PVGHKSH2HB60802XDJ551

[view search results](#)

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Page last updated 12/6/98 3:49:08 PM

Please send technical comments, questions and inquiries regarding this site to:

WATCHHELP@wsp.wa.gov

Please send questions and inquiries regarding criminal history to: [Criminal History Information@wsp.wa.gov](mailto:CriminalHistoryInformation@wsp.wa.gov)

To ensure a response, please include your name, daytime telephone number, e-mail address, and postal address.



Use of the NAME or LOGO of the Washington State Patrol is restricted by law and may be used only with written permission of the WSP.

<https://watch.wsp.wa.gov/watch/confirm.asp>

Hit the 'back' button on your browser to return to your search results.

WASHINGTON STATE IDENTIFICATION SECTION
P.O. BOX 42633
OLYMPIA, WASHINGTON 98504-2633

THE FOLLOWING TRANSCRIPT OF RECORD IS FURNISHED FOR OFFICIAL USE
ONLY

12/6/98 3:52:01 PM

**Pursuant to purpose of inquiry NO RECORD in WASIS files based on
descriptors provided:**

This may mean that the person you searched for has no criminal conviction record
--OR--
that your search criteria do not match the person's name spelling or DOB.

First Name	M.I.	Last Name	Date of Birth: (mm/dd/yyyy)
MICHAEL	J	HUDDLESTON	8/12/55

Email Criminal History Information for fingerprint forms and assistance, or call
(360) 705-5100.

***** N O T I C E *****

SECONDARY DISSEMINATION OF THIS CRIMINAL HISTORY
RECORD INFORMATION RESPONSE IS PROHIBITED UNLESS
IN COMPLIANCE WITH RCW 10.97.050.

POSITIVE IDENTIFICATION CAN BE BASED ONLY UPON FINGERPRINT COMPARISON.

Tower Site												Total WSP																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																	
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**** WSP Consultant has recommended removal and replacement of tower
Survey Prepared by Tower Engineering Consultants, Inc. of Seattle, Washington**